

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

	X	
	:	
JPMORGAN CHASE BANK, NATIONAL	:	
ASSOCIATION, LONDON BRANCH,	:	
	:	Case No. 1:21-cv-09441-PGG
Plaintiff,	:	
	:	
- against -	:	
	:	
TESLA, INC.,	:	
	:	
Defendant.	:	
	:	
	:	
	X	

NOTICE OF PLAINTIFF’S MOTION FOR JUDGMENT ON THE PLEADINGS

PLEASE TAKE NOTICE that upon the accompanying Declaration of Lawrence Portnoy, including all of the exhibits appended thereto, and upon the accompanying Memorandum of Law, and upon all prior proceedings, pleadings, and filings in this Action, Plaintiff will move this Court at the United States Courthouse for the Southern District of New York, before the Honorable Paul G. Gardephe, Judge of the United States District Court, located at 40 Foley Square, New York, New York, at a time and a place to be scheduled by the Court, for an Order pursuant to Rule 12(c) of the Federal Rules of Civil Procedure granting Plaintiff’s motion for judgment in its favor on the pleadings.

PLEASE TAKE FURTHER NOTICE that FRCP 6(c) and Local Rule for the United States District Courts for the Southern and Eastern Districts of New York 6.1(b) governs the filing and service of the moving papers and any opposing or reply papers subject to any other motion return date or briefing schedule the Court may order.

PLEASE TAKE FURTHER NOTICE that (i) pursuant to Section IV.C of the Individual Rules of Practice of the presiding judge, the Honorable Paul G. Gardephe, this Notice of Motion and accompanying documents shall be filed electronically only after the briefing of the opposition and reply has been completed.

Dated: New York, New York
May 23, 2022

DAVIS POLK & WARDWELL LLP

By: /s/ Lawrence Portnoy

Lawrence Portnoy
Greg D. Andres
Sheila R. Adams
Craig T. Cagney
Michael V. Pucci

450 Lexington Avenue
New York, New York 10017
(212) 450-4000
lawrence.portnoy@davispolk.com
greg.andres@davispolk.com
sheila.adams@davispolk.com
craig.cagney@davispolk.com
michael.pucci@davispolk.com

*Attorneys for JPMorgan Chase Bank,
National Association, London Branch*